

ATTACHMENT 9

TRANSCRIPT OF PROCEEDINGS
BEFORE THE
PUBLIC UTILITY COMMISSION OF TEXAS
AUSTIN, TEXAS

SECTION 271 COMPLIANCE)	PROJECT NO.
MONITORING OF SOUTHWESTERN BELL)	20400
TELEPHONE COMPANY OF TEXAS)	

IMPLEMENTATION OF DOCKET NOS.)	PROJECT NO.
20226 AND 20272)	22165

WORKSHOP
MONDAY, MAY 15, 2000

BE IT REMEMBERED THAT AT 9:45 a.m., on
Monday, the 15th day of May 2000, the
above-entitled matter came on for hearing at the
Public Utility Commission of Texas, 1701 North
Congress Avenue, Austin, Texas 78701, before
JOHN MASON, Office of Regulatory Affairs; and
the following proceedings were reported by Lou
Ray, Janis Simon and Nancy Salinas, Certified
Shorthand Reporters of:

1 MCIWorldCom.

2 MR. GUNNELS: Mike Gunnels, AT&T.

3 MR. SIEGEL: Howard Siegel, IP

4 Communications.

5 MS. HAMM: Kim Hamm, Southwestern

6 Bell.

7 MS. STRAW: Elaine Straw,

8 (inaudible) for NorthPoint, Southwestern Bell

9 Ameritech and -- pardon me, not Ameritech and

10 NorthPoint -- Southwestern Bell and Pacific

11 Bell.

12 MR. SWEARINGIN: Tim Swearingin,

13 Southwestern Bell.

14 MR. BORDERS: Dave Borders,

15 Southwestern Bell.

16 MR. LONG: Randy Long,

17 Southwestern Bell.

18 MR. MASON: Okay. And I'm John

19 Mason with Office of Regulatory Affairs.

20 MR. SRINIVASA: I'm Nara Srinivasa

21 with the Telecom Industry Analysis division.

22 MR. MASON: And I think Nara

23 wanted to start off with one of the issues we

24 left off last time, which is looking at ISDN and

25 the standards regarding BRI loop and things of

1 that nature. I don't know if you want to --

2 MR. SRINIVASA: Right. Last time
3 we talked about some issues concerning a certain
4 brand of DLCs that are not compatible for IDSL,
5 and I believe that you were going to get with
6 the vendor or at least bring a representative of
7 Marconi Systems -- I believe that's who the
8 vendor is. Is that correct?

9 MR. BORDERS: Yes, sir.

10 MR. SRINIVASA: And to let us know
11 why or what other problems and how they can
12 rectified. Can you give me an update on that?

13 MR. BORDERS: Okay. We weren't
14 able to get a representative from the
15 manufacturer of Marconi, but I have been -- I
16 received a document from where he-- they stress
17 that ISDN and BRI -- I'm sorry -- Dave Borders
18 Southwestern Bell Telephone.

19 They stress that they do provide an
20 ISDN BRI loop. It has two B channels that have
21 got 64 kilobyte and one D channel for 16
22 kilobyte, and that it is capable of providing
23 ISDN BRI.

24 MR. SRINIVASA: Last time the
25 discussion surrounded, you know, the IDSL

1 criteria are -- is it technically feasible? Is
2 it necessary? Will it impair? You know, under
3 that I don't think there was any exemption on
4 it, but if you think that you were, please let
5 us know. If not, you need to figure out a way
6 to unbundle it.

7 MR. LEAHY: And, for the record,
8 we do have this technical feasibility issue that
9 needs to be addressed. All we've heard is
10 Mr. Bowen expound how he believes that it's not
11 technical issues, or if there is no technical
12 feasibility issue. And my suggestion is that
13 that hasn't been completely teed up at this
14 time.

15 MS. CHAPMAN: And that wouldn't
16 be -- even if that were a way to do that, which
17 I don't know. I'm not the network (inaudible).
18 That wouldn't be an unbundled loop. That would
19 have to be some sort of new UNE that we would
20 have to develop for this virtual
21 (inaudible-cough) or whatever.

22 But you can't unbundle a loop
23 that's fully integrated, and that's what was
24 ordered and that we could not unbundle. So --

25 MR. SRINIVASA: That's what we

1 would -- there is physical access unbundling to
2 the entire loop. There is frequency unbundling
3 that's going to be addressed under the line
4 share. There's bit stream unbundling --

5 MS. CHAPMAN: Which should be
6 something different, but what we ordered was a
7 UNE loop which we could not have provided
8 because that is technically not feasible to do.

9 MR. SIEGEL: Am I understanding
10 that if I'm a CLEC providing voice to the
11 customer in Richardson, I can provide ADSL to
12 them as well through this architecture because
13 the integrated nature of your technology is no
14 longer a factor?

15 MS. CHAPMAN: If you are a
16 reseller, you can do that. That's correct.

17 MR. SIEGEL: What if I'm a UNE-P
18 provider?

19 MS. CHAPMAN: You cannot unbundle
20 a loop period whether it's for DSL or for
21 anything else, because it's fully integrated
22 with both the switch and then the ATM. And
23 since it's fully integrated, it can't be
24 unbundled as a loop.

25 MR. SIEGEL: So UNE-P orders at

1 Richardson get rejected, also, so voice
2 providers can't provide UNE-P voice services
3 either?

4 MR. BORDERS: They can't access
5 the -- you know, it's fully integrated into the
6 switch. There's no --

7 MR. SIEGEL: And if they're
8 using -- if they want to purchase the switch and
9 the loop as unbundled elements, those orders are
10 rejected?

11 MR. BORDERS: The only -- my
12 understanding is that we have resell in
13 Richardson.

14 MS. CHAPMAN: That is correct.
15 Because of the integrated nature, it cannot be
16 unbundled. So it can only -- it's only
17 available as a resell product in Richardson
18 because of the fact that we cannot reunbundle
19 those elements. They are fully integrated.
20 They can't be broken up.

21 MR. BOWEN: Well, but the strange
22 thing is that this looks and feels and sounds to
23 me just like what SBC is offering up, their new
24 broadband UNE, which is basically a permanent
25 virtual circuit. That's what we're talking

1 about -- that's what they're talking about on
2 their new platform which we'll get to later --

3 MR. SRINIVASA: We'll get to that,
4 yeah.

5 MR. BOWEN: But even now, this is
6 the same thing. This is a PVC which goes from
7 the premises to a handoff point. It happens to
8 be an ATM switch at the central office. That to
9 me -- that's a UNE loop.

10 It doesn't go beyond -- it doesn't
11 go into the switch. It doesn't go into the
12 transport network. It comes to the office and
13 gets handed off. If it happens to be handed off
14 at an ATM switch, so what. I mean, that's how
15 that technology works.

16 MR. SRINIVASA: But I believe that
17 your position is that ATM is going to be owned
18 by the ASI (inaudible). They don't have an
19 obligation to unbundle it.

20 MR. BORDERS: That's my
21 understanding.

22 MR. SRINIVASA: That's your
23 position.

24 MR. BORDERS: That's our position,
25 and also in -- that this -- that the

1 configuration is fully integrated into the
2 switch. I don't think there's a breaking point
3 where that to -- you would have to -- you know,
4 if virtually, you could break it up.

5 MR. SRINIVASA: Again, it's soft
6 configured which means --

7 MR. BORDERS: Absolutely, but
8 there's no hard --

9 MR. MASON: We're giving the court
10 reporter a heart attack.

11 MR. BORDERS: Oh, okay.

12 MR. MASON: Let's just remember
13 that we're on the record.

14 MR. SRINIVASA: Yes, please go
15 ahead.

16 MR. BORDERS: Well, anyway,
17 there's just not a break point where you could
18 take and make a -- any kind of physical
19 disconnect. It would have to be into the ATM
20 itself.

21 MR. SRINIVASA: Right. It's soft
22 configured. You route those bit streams or
23 those cells to another provider. It's -- you
24 can define it?

25 MR. BOWEN: And I think the --

1 under this serving topology, which is not going
2 to be unique to this VDSL application of
3 Richardson, this is going to be, as we'll get to
4 in Project Pronto, this will be the technology
5 they're going to use to serve a whole bunch of
6 people.

7 The handoff point is a port at the
8 ATM switch device. That's -- you know, the
9 notion that you can't find the horizontal side
10 of the MDF so you can't do it is anachronistic,
11 shall we say.

12 This serving topology says, "Okay.
13 You put something out there in the field. You
14 have an ATM switch at the central office. You
15 hand off to your data sub. You hand off to us.
16 You hand off to the world. You ride onto the
17 rest of the world perhaps."

18 That's how you do it, and that's
19 where we take our hand off. And so I think the
20 UNE really is, like I said, a PVC that goes from
21 the customer premises to the port on this ATM
22 switch. It's not part of the voice switch at
23 all. It never hits the Class 5.

24 MR. SRINIVASA: Well, this is in
25 the technical feasibility issues. But if the

ATTACHMENT 10

12. Measurement Propose To Eliminate	
Mechanized Provisioning Accuracy	
Definition:	
Percent of mechanized orders completed as ordered.	
Exclusions:	
None	
Business Rules:	
This measurement compares the features ordered on a mechanized order, to that which is provisioned on the switch based on the posted service order.	
Levels of Disaggregation:	
<ul style="list-style-type: none"> None 	
Calculation:	Report Structure:
(# of orders completed as ordered ÷ total orders) * 100	Reported by individual CLEC, CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – Low	
Benchmark:	
Parity	

CLEC Proposals 12

RYTHMS

Levels of Disaggregation: Rhythms proposes to require SWBT to disaggregate this Measure, as follows:

DSL Orders

All Other Orders

Report Structure: Rhythms proposes to add reports for this PM to include: SWBT DSL Retail and SWBT DSL Affiliate.

Benchmark:

Consistent with the proposal to disaggregate DSL Orders, Rhythms proposes to revise the Benchmark, as follows: All Other Orders – Parity, DSL Orders – parity with that provided to SWBT DSL Retail, SWBT DSL Affiliate, or other CLECs, whichever is higher.

See Rhythms/Covad Proposed PMs at 29

MCI

Remove the word “mechanized” in Measurement and Definition.

Change business rule to:

This measurement compares the LSR submitted to the provisioned order. This includes whether the quantity of loops are included on an order are provisioned and whether the order is engineered or conditioned correctly. Further, the measurement ensures that the features are ordered are the features that are provisioned on the switch. The measurement also compares the PICs and hunting requested on an order to that which is provisioned on the switch.

ATT

Add to Business Rules:

Under this measure, an LSR will not count as “completed as ordered” if switch translation results in an actual provisioning failure, regardless of whether SWBT database records show a match between the features ordered and the features provisioned. Examples of actual provisioning failures that would mean an order was not “completed as ordered” include, without limitation, the failure to provision customized routing as ordered by the CLEC, any failure in the setting of AIN triggers, and the failure to open all codes on LNP orders.

Implementation question to be addressed: why is SWBT reporting data under PM 12 for UNE-L orders, where the CLEC provides the switching functionality from its own switch?

BIRCH

Mechanical Order should be defined to be any order submitted electronically by a CLEC.

Report on CLEC LSR as opposed to SORD orders.

Any difference between what is provisioned in the switch and the CLEC’s LSR is reported as a failed order.

COVAD

Report Structure: Covad proposes to add the following:

SWBT DSL Retail, and SWBT DSL Affiliate

Levels of Disaggregation: Covad proposes changing the levels from “none” to DSL Orders and All Other Orders.

Benchmark: Covad proposes the following:

All Other Orders – Parity; DSL Orders – parity with that provided to SWBT DSL Retail, SWBT DSL Affiliate, or other CLECs, whichever is higher

PM 12 is found in Rhythms/Covad Proposed Performance Measurements at 29.

CLEC Proposals 12.1

MCI

MCIW concurs with AT&T’s suggested changes.

35. Measurement	
Percent POTS/UNE-P Trouble Report Within 10 Days (I-10) of Installation	
Definition:	
Percent of N, T, C orders that receive an electronic or manual trouble report on or within 10 calendar days of service order completion.	
Exclusions:	
<ul style="list-style-type: none"> Excludes subsequent reports. A subsequent report is a repair report that is received while an existing repair report is open on the same number. Excludes disposition code "13" reports (excludable reports), with the exception of code 1316, unless the trouble report is taken prior to completion of the service order. Excludes reports caused by customer provided equipment (CPE) or wiring. Excludes trouble report received on the due date before service order completion. 	
Business Rules:	
Includes reports received the day after SWBT personnel complete the service order through 10 calendar days after completion. <u>The denominator for this measure is the total count of orders posted within the reporting month. The numerator is the number of trouble reports received within 10 days of service order completion that were closed during the reporting month.</u>	
Levels of Disaggregation:	
N, T and C Orders POTS <ul style="list-style-type: none"> Field Work (FW) No Field Work (NFW) Business class of service Residence class of service UNE Combo <ul style="list-style-type: none"> Field Work (FW) - No Field Work (NFW) 	
Calculation:	Report Structure:
(Count of orders that receive a initial <u>electronic or manual trouble reports on or within network customer trouble report within 10 calendar days of service order completion</u> ÷ total # of orders) * 100	Reported for POTS Resale by CLEC, total CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	

Resale POTS parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types). UNE Combo Parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types).

CLEC Proposals 35

MCI

Add new business rule:

Unsolicited FOCs will not be acknowledged in calculating due dates. (i.e., if an unsolicited FOC is received by CLEC, the due date on the first FOC will still be used as the due date

Change measure to 30 days

Add under Levels of Disaggregation:

UNE Combo

- ☐ Business class of service
- ☐ Residence class of service

ATT

Add to Business Rules:

The denominator for this measure is the total count of orders (LSRs) that {specifics to be developed during the workshop, through discussion with SWBT}. The numerator is the number of orders (LSRs), out of those included in the denominator, that receive a trouble report on or within 10 days of service order completion.

Add to Levels of Disaggregation:

- UNE Combinations with Advanced Services (i.e., voice service provided by CLEC via UNE combination, advanced services provided on same line)
 - Advanced Services provided by ILEC
- Advanced Services provided by CLEC

PMs 27-42:

Add to disaggregation levels:

Wherever SWBT currently is required to report data for UNE combinations, the data should be reported separately for:

- UNE combinations used to serve business customers
- UNE combinations used to serve residential customers

Add to Benchmark:

SWBT will use SWBT retail POTS data for business customers as the parity comparison for UNE combinations used to serve business customers, and it will use retail POTS data for residential customers as the parity comparison for UNE combinations used to serve residential customers.

BIRCH

Define dates to be measured

NEW PM - CLEC Proposals 35.1

ATT

35.1 Measurement: Provisioning Trouble Notifications (Prior to Service Order Completion)

Definition:

Measures the percent of orders that receive a provisioning trouble notification (via customer or indirectly by CLEC) during the provisioning process, prior to issuance of a service order completion.

Exclusions: TBD

Business Rules:

The percent of CLEC LSRs for which a provisioning trouble notification is received by SWBT after SWBT returns a firm order confirmation and before a service order completion has been issued. For SWBT retail orders used for parity comparison, includes trouble reports between issuance of a service order by the SWBT customer service representative and confirmation within SWBT's systems that the order has been completed. This measure is intended to capture troubles reported during the provisioning process itself, which are not included within PM 35.

Levels of Disaggregation:

- N, T and C orders

POTS Resale

- Field work
- No field work
- Business class of service
- Residence class of service

POTS UNE Combination

- Field work
- No field work
- UNE combination used to serve business customers
- UNE combination used to serve residential customers
- UNE Combinations with Advanced Services (i.e., voice service provided by CLEC via UNE combination, advanced services provided on same line)
 - Advanced Services provided by ILEC
 - Advanced Services provided by CLEC

Calculation:

Count of LSRs that receive a trouble notification prior to SOC issuance ÷ total # of LSRs

Report Structure: CLEC, total CLECs, and SWBT

Measurement Type:

Tier 1 – High; Tier 2 – High

Benchmark: Parity

MCI

MCIW concurs with AT&T's suggested changes.

BIRCH

Birch proposed changes concur with AT&T proposed changes, in preliminary draft provided to CLECS, to measure customer trouble prior to service order completion

ATTACHMENT 11

“CLEC USER FORUM UPDATES – Arkansas, Kansas, Missouri, Oklahoma, Texas”

Date: March 15, 2000

Number: **CLEC00-063**

Contact: Southwestern Bell Account Manager

As a result of the last CLEC User Forum (CUF) meeting held in Dallas on February 24th, there are several follow-up items that require action by CLECs.

1. At the last walk-through of the CLEC User Forum Guidelines on February 24th, it was decided that the first conference call of the Executive Steering Committee (ESC) would be held on **March 20th**. CLECs may have a representative on the ESC. In order to register a representative on this committee, CLECs should send the following information to Eva Hardy at exhardy@pacbell.com :

- Name
- Title
- Company
- Address
- Email address
- Telephone Number.

Logistics for the March 20th call will be sent to all registered ESC Representatives.

2. CLECs may also have a primary representative for the general CUF. Whereas multiple representatives from a company may attend the general meetings, only one representative from each CLEC will be designated as that company's official representative/member of the CUF. Please send the same information requested above for the general CUF representative to Eva Hardy.

3. The first meeting of the general CUF has been scheduled for **April 6th** in Dallas. Logistics for the meeting will follow in a separate Accessible Letter.

4. Attachment 1 is an Issues Submission Form, to be used to submit issues to the ESC. Following the Guidelines, ESC members should submit completed issue forms to Eva Hardy for discussion at the ESC meetings.

5. Attachment 2 is the revised CLEC User Forum Guidelines.

Attachments

**CLEC USER FORUM - SWBT 5-State Region
ISSUE SUBMISSION FORM**

Title of Issue: _____ Assigned
Number: _____

Sponsoring CLEC Company Name: _____

Sponsoring CLEC Representative:

Name: _____

Email: _____

Tel: _____

Fax: _____

Sponsoring CLEC's SWBT Account Manager Name:

Issue Category: _____

☒ Network

☒ Process

☒ Mtn/Repair

☒ Billing

☒ Order/Provisioning

☒ Other

Issue Description:

Actions/Steps Taken to Date

Extent of Impact on Business & CLEC Community:

Supporting Documentation Submitted with Issue:

CLEC User Forum GUIDELINES

I. PURPOSE/FOCUS

The CLEC User Forum (CUF) will provide a means for the CLECs and/or SWBT to identify, submit, discuss and resolve issues, which impact SWBT and CLECs in daily business practices. The issues will include, but not be limited to the following:

- Network Operations
- Business Processes
- Ordering and Provisioning
- Maintenance and Repair
- Billing
- Other

The issues addressed by this forum are those which impact the daily business practices of multiple CLECs. It is not the intent of this forum to address issues, which solely impact a single CLEC. The CLEC User Forum should not be used to circumvent the Account Management process and other problem resolution processes available through SWBT. The User Group Forum is not intended to serve as a Regulatory Forum. Both CLECs and SWBT will work to resolve any issues brought before the CLEC User's Forum. However, this process does not limit any parties right to seek remedies before regulatory or in the legal arena.

The intention of all participants and the Forum as a whole is to work cooperatively through a defined problem resolution process. When one issue is addressed in one CLEC User Forum region that impacts other SBC regions, all regions should be either included in the discussions of those issues or SBC will initiate and/or administer the discussion of those issues in the other regions that are effected.

The parties intend for the CLEC User Forum process to be dynamic in nature, managed through regularly scheduled meetings and based on group consensus.

II. STRUCTURE

The Forum will consist of a two-tier organization:

A. EXECUTIVE STEERING COMMITTEE

The Executive Steering Committee (ESC) will consist of one representative from each CLEC and, one from SWBT. It is the responsibility of each CLEC and SWBT to provide the appropriate representation on this committee. The representatives who serve on the Executive Steering Committee must have the knowledge and authority to discuss and make decisions about a broad range of issues that may impact any functional area of the business.

This Committee will be responsible for the receipt and prioritization of issues for discussion and resolution within the CLEC User Forum. This committee will provide oversight and monitor progress to insure that issues are being worked to resolution. The Executive Steering Committee will also coordinate and address escalated issues, i.e. those issues that the User Group Forum has been unable to resolve in the cooperative process.

A CLEC Chair and Co-chairperson will facilitate the Executive Steering Committee. These individuals will be elected by a unanimous secret ballot of the Executive Steering Committee and will serve for a six-month period. The CLEC chairperson will be responsible for facilitating all meetings and any necessary follow-up after meetings/conference calls of the Committee. The Chairperson will be responsible for insuring that the purpose and agreed upon processes of the CLEC User Forum (as described herein) are adhered to.

To distribute the workload, the Co-chair will share or assist with the responsibilities with the Chair, e.g. periodically facilitate meetings, and will become the Chairperson at the end of the six-month interval.

SWBT will assign one additional representative to the Executive Steering Committee to assist the Chair/Co-Chair with administrative functions. This representative will facilitate meeting logistics and accommodations as well as communications with the CLEC participants and the CLEC community.

The Executive Steering Committee will participate on conference calls occurring twice a month on a regularly scheduled basis, e.g. every other Monday. Once per quarter, the Executive committee will meet in person to discuss additional process issues not normally covered during the conference calls. This would be scheduled in conjunction with the CLEC User Forum scheduled during the second month of the quarter.

The Executive Steering Committee also has the responsibility to maintain this charter. In the event that some defined process or policy for the Forum is not in the best interest of the group, the ESC will draft modifications to the Charter and present it to the CUF for general consensus approval.

B. CLEC USER FORUM

The CLEC User Forum will consist of an assigned CLEC representative(s) as well as CLEC and SWBT subject matter experts from various areas, as may be required based on the issues being worked by the Forum. It is the responsibility of each CLEC to have at least one representative present for CLEC User Forum activities on a regularly scheduled basis. The person or persons attending the Forum must be able to represent operational issues within the defined scope of the group. This person or persons must be committed to the purpose of the CLEC User Forum.

The function of the CLEC User Forum is to discuss and resolve issues that have been designated by the Executive Steering Committee as appropriate for this forum. Through discussion of the issue, the Forum will determine how an issue will be worked to resolution, and may elect to assign the issue to a smaller designated group or task force to be worked, i.e. researched further, determination of an acceptable solution, etc. This group will track progress, document results and report status to the Executive Steering Committee, as described in greater detail under Section D.2. Issue Tracking and Status Reporting.

The CLEC User Forum will meet in person monthly on a regularly scheduled basis. The date and time of the meeting will be scheduled at the previous month's CLEC User Forum. Some issues may require status calls with a subgroup of the Forum in between the monthly meetings.

III. PROCESS AND ADMINISTRATIVE PRACTICES

A. SUBMISSION OF CLEC ISSUES

A CLEC may submit an issue to the Executive Steering Committee using a simple form. These forms consist of the CLEC name, CLEC representative who will be sponsoring this issue, SBC Account Manager's Name, the title of the issue, a definition of the issue and extent of the business impact, as well as an explanation of how it affects the general CLEC community. Examples or data, which will help facilitate the Committee's understanding of the issue, should also be included if possible.

Administratively, the form should be submitted to the SWBT facilitator assigned to the Executive Steering Committee, who will enter the issue on the submission log and electronically distribute the form and information to the Executive Steering Committee.

B. STEERING COMMITTEE ISSUE REVIEW PROCESS & GUIDELINES

It will be the responsibility of the sponsoring CLEC to ensure that a submitted issue will benefit the CLEC community as a whole and is not an issue that pertains solely to that CLEC. However, if an issue effects only one CLEC at the time the issue is submitted, but the sponsoring CLEC feels that it may effect others in the long term, then that issue should be submitted for Executive Steering Committee review. It will be the responsibility of the submitting CLEC to champion the issue throughout the process, i.e. present to the Executive Steering Committee and if necessary the CLEC User Forum.

CLEC issues may be presented and discussed during any bi-weekly Executive Steering Committee Meetings. After the issue(s) have been presented, the Committee will review to ensure compliance in accordance with the following guidelines:

- The Forum's stated purpose and focus
- Applicability to multiple CLECs
- Extent of impact on business practices (if prioritization is required due to volume of issues being addressed by the Forum)

The Steering Committee will by majority vote accept any issue that meets these criteria. If accepted, the issue will be placed on the agenda for the next regularly scheduled CLEC User Group Forum.

In the event that this Committee rejects any issues that are brought to the Forum by a CLEC, an explanation of why those issues were rejected will be posted to the submission log for review and comment by any CLEC Forum Representative.

C. WORKING AND RESOLVING ISSUES WITHIN THE CLEC USER GROUP FORUM

In most cases, the sponsoring CLEC will be responsible for presenting the issue at the next regularly scheduled meeting of CLEC User Group Forum. The Executive Steering Committee Chair/Co-Chair is responsible for insuring that information regarding the issue is distributed to the designated CLEC User Forum representatives at least two weeks prior to the meeting so that each CLEC can determine what subject matter experts may be required to attend the next meeting. The CLEC User Forum will then review and discuss the issue and determine the appropriate process and/or action items required to establish a solution for the issue.

Resolution can only be reached if all those at the CLEC User Forum unanimously feel that the issue has been properly addressed and the resolution discussed will adequately fulfill the needs of the CLEC that has sponsored the issue. Resolution will be determined through a voting process. At the time that resolution is reached, it will be the responsibility of the CLEC User Forum, specifically the

sponsoring CLEC representative unless otherwise designated, to formally communicate the resolution back to the Executive Steering Committee to insure proper communication to the entire CLEC community.

If, during the resolution process, an impasse is reached by the CLEC User Forum, the issue can be “escalated” back to the Executive Steering Committee. If the reason for the impasse deals with a difference of opinion between SWBT representatives and CLEC representatives, the Steering Committee will facilitate the escalation of the impasse back to SWBT. SWBT will accept this escalation at the Executive Director Level within the relevant SWBT organization(s).

The sponsoring CLEC will be responsible for tracking and communicating the status of the issue in the open issues log in accordance with the guidelines set forth in Section III.D., Tracking and Communication of Issue Status. At a minimum, every open issue being worked should have a current status available for Steering Committee and CLEC User Group Forum review at every regularly scheduled meeting.

D. ISSUE TRACKING AND STATUS REPORTING

1. Issues Log

In addition to the submitted issues log, an open and closed issue log will be created and used by the CLEC User Forum for tracking purposes. Detailed meeting notes will not be taken or published. The open issues log will consist of the following items:

- ◆ Issue number
- ◆ Issue Name
- ◆ Summary description of issue
- ◆ Date Opened and Date Due
- ◆ Priority
- ◆ CLEC Sponsor & Contact Information
- ◆ SWBT Sponsor
- ◆ SWBT Account Manager
- ◆ SWBT Service Manager
- ◆ Most Current Status/Action Items

Once an issue has been resolved and formally closed by the Executive Steering Committee, the information from the open issues log will be transferred to a separate closed issues log for future reference if necessary.

The open issues log will be included as an agenda item for review in each regularly schedule CLEC User Forum meeting.

2. Issue Tracking and Status Reporting

The ultimate responsibility of tracking and providing status of the issues will fall upon the Executive Steering Committee. The representative on the Executive Committee from the company who presents a proposed issue to the Steering Committee will become the sponsor for that issue (Sponsoring CLEC Representative). The corresponding CLEC representative at the Forum, whether that is the standard CLEC User Forum representative or the subject matter expert for that particular issue, becomes the co-sponsor along with the appropriate SWBT representative. The co-sponsors shall be the designated representatives and have the following responsibilities: 1) coordination of additional meetings, 2) provide status for tracking and resolution, 3) leading sub committees designated by the CLEC User Forum, 4) provide status and reports back to the Steering/Executive Committee.

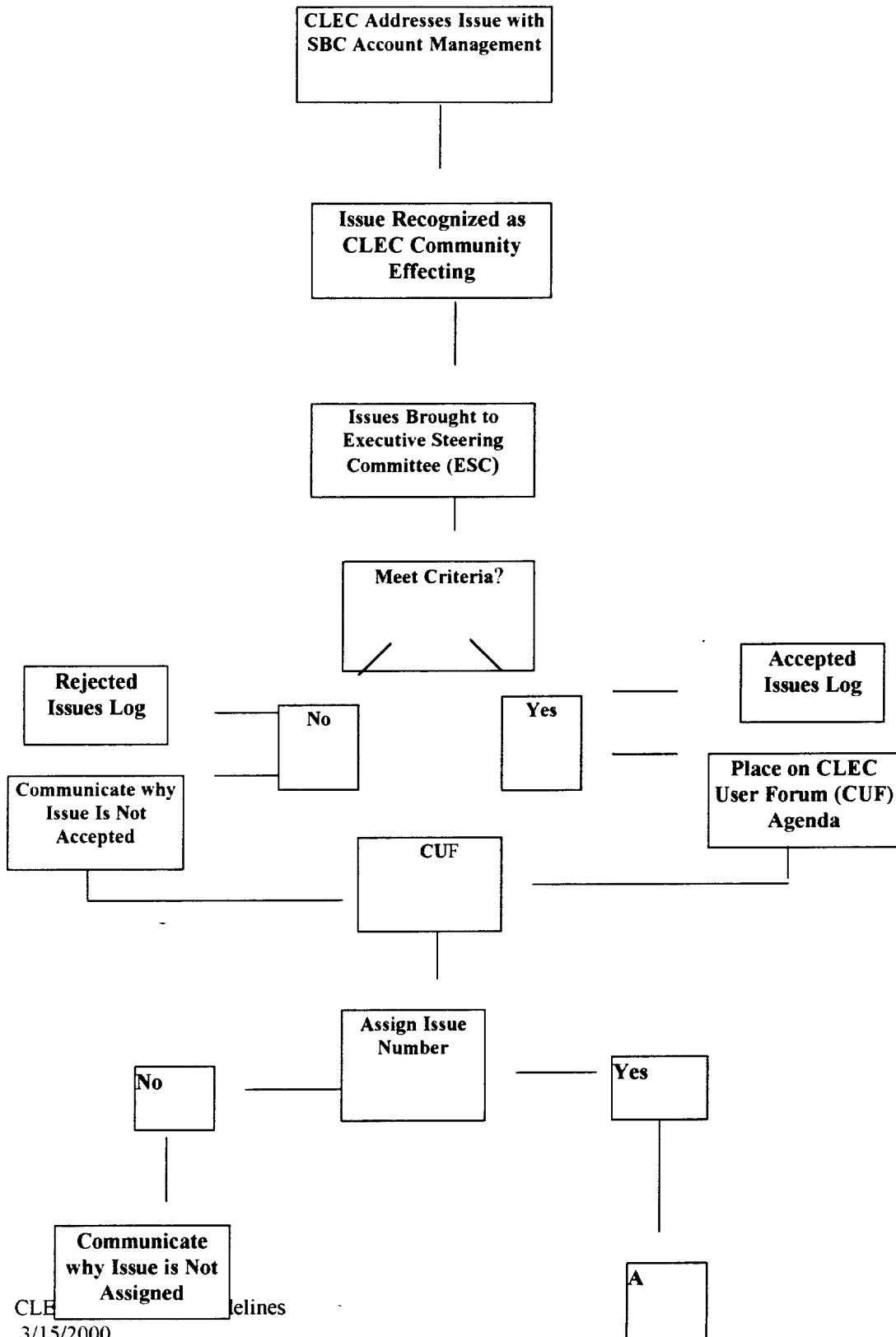
Frequency of status reports from sub-team (if applicable): Prior to Executive Steering Committee's second monthly meeting, the company's issue representative(s) must provide status to the Sponsoring CLEC representative who will be participating on the bi-weekly conference call. To the extent the issue is not being worked appropriately, or should anyone on the Committee have questions, the issue will be discussed. Otherwise, the status is documented in the issue log and reviewed accordingly at the next CLEC Forum.

E. COMMUNICATION WITH CLEC FORUM PARTICIPANTS AND CLEC COMMUNITY

Communication with all participants as well as the CLEC Community is very important. Two tools will be used to facilitate communication of the CLEC Forum Activities. First, the monthly CLEC Forum meeting agenda and the current Open Issues log will be published via Accessible Letter prior to the meeting. In addition, the CLEC User Forum hopes to utilize a web site location, facilitated by SWBT, where all available information about CLEC User Forum activities will be posted. The web site should also facilitate the maintenance of current information in the Open Issues Log.

If the resolution of the issue will effect a change in SWBT processes, systems, etc., it will be SWBT's responsibility to communicate those changes to the CLEC community via Accessible Letter and work the process or system changes through the established change management processes.

CLEC USER FORUM PROCESS FLOW



CLEC USER FORUM PROCESS FLOW (Continued)

